

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-17 Please refer to footnote 25 on page 31 of the Verizon Panel Testimony where it states that "Verizon's own employees undergo significant training before they are permitted to work in CO, and some are even specifically trained and authorized to work on particular CO equipment, as noted above." Please identify all of the training that Verizon's own employees undergo before they are permitted to work in the CO. Please provide the average number of training days for each Verizon technician and provide copies of all training manuals.

REPLY: Verizon MA has different types of CO technicians who are trained to perform specific functions based on their job responsibilities. Before CO technicians are permitted to work independently in the CO, they must undergo specific training relating to their particular job. Such training may include courses, simulated exercises, and/or supervised "on-the-job" training, or some combination of these training methods. During 2001, a CO employee completed an average of 49 hours of training.

After a CO technician completes this initial training, he/she undergoes a progressive series of training. A list of basic courses that various CO technicians would take during their first two years is attached. CO technicians also receive upgrade training as new technologies and equipment are introduced in the CO. In addition taking courses and gaining practical CO experience, CO technicians become increasingly proficient in their job responsibilities by participating in sophisticated training lab environments where CO tasks are simulated, and not customer-service affecting.

**REPLY: Conversent 1-17
CONT'D**

Verizon MA objects to this request to the extent that it seeks production of all training manuals on the ground that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Verizon MA estimates that there are approximately 34 binders, each of which is approximately 100 to 200 pages in length, used to train CO technicians. This vast amount of training materials is considered proprietary and competitively sensitive, and is not available in a centralized Company location. In addition to these Company training manuals, there is interactive, Web-based training, as well as vendor-provided training guides, which are purchased from and copyrighted by third parties and, therefore, Verizon MA is not at liberty to disclose.

Without waiving these objections, Verizon MA states as follows. Due to the voluminous nature of this request, Verizon MA will make available for inspection at a mutually agreeable time specific Company training manuals, upon request, as they relate to a particular training course identified in the Attachment. Only the specific training materials requested will be available at the Company's location at 125 High St., Boston, MA, and viewing will be subject to a suitable protective agreement. Since it is extremely burdensome to compile this highly voluminous material, Verizon MA is not providing the Department with a copy of all training manuals.

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